

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
V. ) No. 16-10305-NMG  
 )  
MARTIN GOTTESFELD, )  
 )  
 )  
Defendant )

**DEFENDANT'S REVISED MOTION TO EXTEND  
TIME TO FILE SUPPLEMENTARY MOTION TO SUPPRESS**

Defendant Martin Gottesfeld hereby moves this Honorable Court for an order extending the date by which he is to file a supplementary motion to suppress the search warrant herein from February 15 to March 6, 2018. This motion revises defendant's "First Motion to Extend Date for Filing Supplemental Motion to Suppress". D-106. Defendant seeks less of an extension than requested in the previous motion and wishes to point out to the Court that the indication in that motion that it was assented to by the government was an inadvertent error on counsel's part.

Defendant seeks less time for an extension with this motion because he has determined that it will not be necessary to download the hard drives referenced in the previous motion. There remain, however, two hundred forty-eight spread sheets, each containing approximately 10,000 lines of intercepted traffic which will still have to be reviewed and analyzed by his expert. Consequently, it is estimated that the expert will require 3-4 days for review and analysis. That review cannot start until the pending ex parte motion for costs and appointment has been allowed.<sup>1</sup>

<sup>1</sup> Defendant will file this date a revised ex parte motion requesting an allowance of a lesser amount of costs based

*Motion allowed, in part, and denied, in part; supplemental motion to suppress will be filed on or before Thurs., March 1, 2018, opposition on or before Thurs., March 15, 2018. Hearing on motion to suppress, if any, will be held on Mon., March 26, 2018, at 3:00 p.m. All other deadlines remain as previously determined. S/M/Gorton, USDJ 2/21/18*